FY 2012 Citizenship and Integration Grant Program Questions and Answers

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About the Grant Program

1. What is different about this year's grant program?

There are several important changes to this year's grant program:

- Current awardees under FY 2011 Citizenship and Integration Grant Program funding opportunities DHS-11-CIS-010-003, DHS-11-CIS-010-002 and DHS-11-CIS-010-001 may <u>not</u> apply because the FY 2011 two-year period of performance will not expire before the start of the new program.
- Applicants may request a maximum grant award of \$160,000.
- USCIS will not offer the National Capacity Building grant program.
- USCIS will not offer the Citizenship Instruction Only Direct Services grant program.
- Applicants must propose citizenship preparation programs consisting of both citizenship instruction and naturalization application services components.
 Partnerships between organizations that provide citizenship instruction and organizations that provide naturalization application services are encouraged.

2. Last year USCIS awarded approximately \$9 million in grant awards. Why did the total award amount decrease to \$5 million this year?

Since its creation, USCIS has received appropriations for the grant program. In FY 2009 USCIS awarded 13 organizations a total of \$1.2 million. In FY 2010 nearly \$8.1 million went to 56 organizations. In FY 2011 USCIS granted approximately \$9 million to 42 organizations. In FY 2012, however, Congress authorized USCIS to continue the grant program using fee revenue. In an effort to balance the importance of the grant program to USCIS' civic integration mission with the impact a fee-funded program would have on our applicants and petitioners, USCIS will make an investment of \$5 million to continue the program in FY 2012.

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Eligibility

1. Are partnerships allowed?

Yes, partnerships are allowed and encouraged. A partner organization is considered a "sub-awardee" if the organization will receive a portion of the grant funding to provide additional or complementary direct services. If a sub-awardee is proposed, the applicant **must** provide the citizenship instruction. The sub-awardee may provide additional citizenship instruction, naturalization application services, or both. The applicant must complete a Memorandum of Understanding (MOU) with the proposed sub-awardee. The applicant must show how it will monitor the sub-awardee's performance and ensure that the sub-awardee complies with all grant award conditions and data reporting requirements. Sub-awardees must have a Data Universal Numbering System (DUNS) number and will be responsible for financial reporting.

2. My organization applied for the Citizenship Instruction Only grant program in previous years, but that program is not offered this year. Is there any way my organization can still apply?

If your organization has recent experience providing citizenship instruction, but not naturalization application services, your organization is not eligible to independently apply. In order to be eligible to apply, your organization will need to find a qualified partner that meets the eligibility criteria to provide the naturalization application services.

3. Are current National Capacity Building Grant Program sub-awardees allowed to apply for the FY 2012 funding opportunity?

Current National Capacity Building Grant Program sub-awardees may apply for the FY 2012 funding opportunity only if their period of performance ends on or before September 30, 2012.

- 4. Are applicants required to be recognized and/or accredited by the Board of Immigration Appeals? If so, how does our organization prove BIA recognition? Applicants and any proposed sub-awardees must either: (1) Be recognized by the Board of Immigration Appeals (BIA) and have a BIA accredited representative on staff who provides or supervises the naturalization application services; or (2) Have an attorney on staff who provides or supervises the naturalization application services. It is not required to provide proof of BIA recognition or accreditation in order to apply. A list of recognized and accredited organizations is publicly available on the U.S. Department of Justice's website. USCIS may ask for additional documentation before making an award.
- 5. Do applicant organizations need to demonstrate 501(c)(3) status or is it acceptable to simply be a non-profit organization?

It is not necessary to have 501(c)(3) status. However, to be eligible, you must provide proof of public or non-profit status as defined in Section IX.8 of the funding announcement.

6. Can an organization with pending 501(c)(3) status apply?

Prior to submission of an application, applicants must have proof of public or non-profit status, as described in Section IX.8 of the funding announcement.

7. Is the applicant required to have a certified instructor to conduct the citizenship classes?

It is the applicant's responsibility to demonstrate that staff members are qualified to provide citizenship instruction. Applicants will be assigned a score based on their qualifications and experience. See Section V of the funding announcement.

8. Do individuals providing citizenship services to immigrants qualify as eligible applicants?

No.

9. Are for-profit entities eligible to apply?

No.

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Grant-Funded Activities

1. Can my organization propose to provide general English as a Second Language (ESL) classes or Adult Basic Education under this funding opportunity?

Grant funding is available for citizenship instruction to prepare permanent residents for naturalization. Citizenship instruction must prepare permanent residents for the civics (U.S. history and government) and English (reading, writing, and speaking) components of the naturalization test. Applicants may not propose to use grant funds for other types of instruction.

2. Is my organization allowed to charge a fee for services?

Applicants are allowed to propose a fee for citizenship instruction and/or naturalization application services, however, the fees must be nominal. The project narrative and budget should include the amount proposed and explain why this fee is necessary within the program structure. The applicant must also show how the fees will be used to support the grant-funded program.

3. Can the grant funds be used to pay the costs associated with BIA recognition and accreditation?

Yes. However, at the time of application, applicants must be BIA recognized and have a BIA accredited representative, or have an attorney, who provides or supervises the naturalization application services. Applicants may use grant funds to pay for additional staff members to pursue BIA accreditation. If the applicant proposes to work with a partner organization and the applicant provides only citizenship instruction, the applicant may use grant funds to pay the costs associated with BIA recognition and accreditation.

4. Must individuals receiving grant-funded services be permanent residents or can they have any legal immigration status?

Individuals receiving services under this grant program must have the status of lawful permanent resident (LPR). Applicants must demonstrate how they will verify and document that only permanent residents will receive grant-funded services.

5. The funding announcement states that organizations must provide services to permanent residents only. If our organization also serves other immigrants, should we place permanent residents in a class by themselves?

Organizations must adequately demonstrate that *only permanent residents* will receive services funded by the grant. Applicants must demonstrate how they will ensure that they are using grant funds to serve only permanent residents.

6. How many permanent residents should receive services for the funds and time allotted?

USCIS does not require that a specific number of permanent residents receive citizenship preparation services. Applicants should rely on their own experience to set goals that are achievable for their respective organization.

7. Can organizations use volunteers to provide services? How would USCIS like to see organizations using volunteers?

Yes, applicants are encouraged to use volunteers to provide services. It is up to the applicant to decide how to make the best use of volunteers.

8. Can organizations limit services to one ethnic, religious, or language group they currently serve?

No. Eligible participants must be served regardless of their ethnic or religious backgrounds or the language they speak.

9. Are the grants a one-time opportunity, or will there be a chance for grantees to renew the funding?

The performance period is two years. There is no option to renew funding after two years.

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Application

1. Is there a format for the Memorandum of Understanding (MOU)?

There is no required format. The MOU must be signed by all parties. The MOU should clearly describe the scope of work to be performed, roles, responsibilities, and agreed upon activities, including remuneration, and other terms and conditions that structure or define the relationship (e.g., in-kind services, dollars, staff, space, equipment, etc.).

2. Should organizations submit an MOU for individual volunteers?

The MOU is required for any formal agreement between the applicant and another organization. MOUs are not required for individual volunteers.

3. Can my organization submit more than one application?

No. Organizations can submit only one application. If an organization submits multiple applications, prior to commencing review, USCIS will contact the organization to confirm which application the organization wants to include in the review process. The other application will not be reviewed.

4. Can a partner organization be listed on multiple applications?

Yes. However, USCIS reserves the right to contact all organizations included in the application prior to making an award.

5. Can we submit letters of support?

The funding opportunity announcement states that no other documentation should be submitted other than what is requested. USCIS will not consider letters of support.

6. Are sub-awardees required to have a DUNS number? Yes.

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Budget

1. Are we required to submit both a budget narrative and a budget table? Yes. The budget table is a new requirement for FY 2012. For more information, see Section IX.4 of the funding announcement.

2. In our application, my organization proposes to work with several partners who will provide additional direct services and receive a portion of the grant funds. Should my organization submit one combined budget narrative or separate budget narratives?

The applicant must submit a budget narrative and table for the applicant and a separate budget narrative and table for each sub-awardee (i.e. a partner who will receive a portion of the grant funds to provide additional or complementary direct services). Please provide the same level of detail for all budget narratives and budget tables.

3. Is sub-contracting permitted?

Organizations may propose to sub-contract specific tasks, such as hiring additional citizenship instructors on a contractual basis. However, the applicant must directly manage the citizenship instruction and must demonstrate its ability to successfully manage all aspects of the grant-funded project, including financial management.

4. Which budget category includes facility rental costs?

Facility rental costs should be included under "Other Direct Costs" (see Section IX.4 of the funding announcement). Facility rental costs should not exceed more than 20 percent of the total approved budget.

5. How does my organization demonstrate its approved fringe benefit rate?

If a fringe benefit has been negotiated with, or approved by, a cognizant federal agency, please provide a copy of the agreement. If no rate agreement exists, provide a breakdown of the amounts and percentages that comprise fringe benefit costs such as health insurance, FICA, retirement insurance, taxes, etc. Identify the base for allocating these fringe benefit expenses. See Section IX.4.c of the funding announcement.

6. Can organizations apply for less than the maximum award amount? Yes.

Evaluation

1. Will USCIS look more closely at organizations who have limited resources as opposed to organizations with substantial resources that do not necessarily need additional funding?

An organization's net worth is not one of the evaluation criteria for the Citizenship and Integration Grant Program.

- 2. What are the points by which applicants will be judged?
 - The evaluation criteria and corresponding point values are found in Section V of the funding announcement.
- 3. How can Citizenship and Integration Grant Program applicants obtain feedback about their application so that they are better prepared to apply in the future? After the public announcement of this year's grant recipients, unfunded applicants may request a written summary evaluation and score breakdown by sending an e-mail to: citizenshipgrantprogram@dhs.gov. Results will be sent to the requesting organization within 60 days from the date the written request is received.